

**Committee Secretary  
Senate Environment and Communications Legislation Committee  
PO Box 6100 Parliament House  
CANBERRA ACT 2600**

Lodge online: [www.aph.gov.au/Senate/committee/ec\\_ctte/product\\_stewardship](http://www.aph.gov.au/Senate/committee/ec_ctte/product_stewardship)

### **SUBMISSION: Product Stewardship Bill 2011**

The National Packaging Covenant Industry Association (NPCIA) supports the Product Stewardship Bill 2011 and welcomes the continued national approach to product stewardship as it avoids the inefficiency associated with different state and territory laws applying to the same products.

The NPCIA accepts the basis for obligations to be imposed on manufacturers, importers, distributors and others and the voluntary, co-regulatory and mandatory regulatory approach based on the Australian Government's requirements for regulatory impact analysis to be met, especially the provisions having regard for the problem or issues that give rise to the need for action.

The National Packaging Covenant Industry Association (NPCIA) has a key role in the administration and management of the Australian Packaging Covenant. 750 companies representing an estimated 80% of all packaged retail brands sold in Australia and 90% of the packaging produced in Australia at 30 June 2010 are members of the NPCIA. They represent a combined annual turnover of more than \$160 billion in the supply chain.

The Australian Packaging Covenant delivers an important component of the National Waste Policy and promotes a lifecycle approach to the management of consumer packaging and is not just a collection system. It is the 21 Century management tool applying to consumer packaging along the whole supply chain which is now a mature, national, co-regulatory alternative for the regulation of packaging that delivers significant environmental, economic and social benefits to the community, industry and government.

The Australian Packaging Covenant adopts a pro-active approach to dealing with consumer packaging and relies on incentivizing rather than punitive approaches. It is the voluntary part of an industry and government commitment to reduce the environmental impacts of packaging by encouraging improvements in packaging design, higher recycling rates and effective stewardship of packaging. It is underpinned by co-regulatory provisions, consistent to what is envisaged under the Product Stewardship Bill, to deal with industry "free riding".

The Australian Packaging Covenant provides real and practical product stewardship and is considered to provide the least compliance burden approach to product stewardship. The Australian Packaging Covenant is already established, has operated successfully for more than 10 years and is an example of product stewardship that is envisaged by the Product Stewardship Bill 2011.

The NPCIA would be happy to discuss its views on the Product Stewardship Bill 2011 with the Senate Environment and Communications Legislation Committee, so please do not hesitate to contact me should the Committee wish to discuss.

**Stan Moore**

Chief Executive Officer

4 April 2011

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**NPCIA Committee Members:**

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|-----------------------|--|
| Alec Wagstaff (Chair) | Packaging Stewardship Forum                |
| Tony Mahar            | Australian Food & Grocery Council          |
| Rod Welford           | Australian Council of Recycling            |
| Gavin Williams        | Packaging Council of Australia             |
| Peter Bury            | Plastic and Chemicals Industry Association |
| Vivienne Filling      | Australian Industry Group                  |
| Russell Goss          | Australian National Retailers Association  |

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